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10 Special Insurance Counsel for Debtor and
11 Debtor in Possession
12 PLANT INSULATION COMPANY

13 UNITED STATES BANKRUPTCY COURT
14 NORTHERN DISTRICT OF CALIFORNIA

15 In re
16 PLANT INSULATION COMPANY, a
17 California corporation,
18 Debtor.

19 Case No. 09-31347-TC

20 Chapter 11

21 **SNYDER MILLER & ORTON LLP'S
22 THIRD COVER SHEET APPLICATION
23 FOR REIMBURSEMENT OF EXPENSES
24 FOR THE PERIOD FROM OCTOBER 1,
25 2009 THROUGH OCTOBER 31, 2009**

26 [No Hearing Required]

27 Judge: Hon. Thomas E. Carlson

28 Snyder Miller & Orton LLP ("SMO") submits its Third Cover Sheet Application (the
"Application") for Reimbursement of Expenses for the Period from October 1, 2009 through October
310, 2009 (the "Application Period"). In support of the Application, SMO respectfully represents as
follows:

29 1. SMO is Special Insurance Counsel for debtor and debtor in possession Plant Insulation
30 Company (the "Debtor") in the above-referenced Chapter 11 case. SMO hereby applies to the Court
31 for reimbursement of expenses incurred during the Application Period.

1 2. SMO billed a total of \$9,183.62 in expenses during the Application Period.
2 3. SMO seeks reimbursement of 100% of these expenses. Because these costs are below
3 the Contingency Professional Expense Cap, as defined by this Court's *Order Establishing Interim*
4 *Fee Application and Expense Reimbursement Procedures* entered on September 24, 2009 (the
5 "Interim Fee Procedures Order"), the Debtor is authorized to reimburse SMO for these expenses
6 without prior Court approval.

7 4. The following chart reflects (1) the post-petition compensation and expense
8 reimbursement amounts SMO has obtained authority to receive from the Debtor's estate pursuant to
9 Interim Fee Procedures Order, and (2) excluding the amounts sought by this Application, the post-
10 petition compensation and expense reimbursement amounts that are currently due and owing to SMO
11 from the Debtor's estate:

Fee Statement Period	Fees Sought (100%)	Expenses Sought (100%)	Fees Authorized (80%)	Expenses Authorized (100%)	Unpaid Fees	Unpaid Expenses
5/20/09 – 8/31/09	NONE	26,288.33	NONE	\$26,288.38	NONE	NONE
9/1/09 – 9/30/09	NONE	\$1,680.79	NONE	\$1,680.79	NONE	\$1,680.79

18 5. Attached hereto as **Exhibit A** is the detailed billing statement for the Application
19 Period, which includes a breakdown of the expenses incurred during the Application Period.
20 Although the date of some of the advances listed on the detailed billing statement are prior to the
21 Application Period, SMO paid and billed those advances during the Application Period.

22 6. SMO has served a copy of this Application on the Office of the United States Trustee,
23 the Debtor, counsel for the Official Committee of Unsecured Creditors (the "Committee"), and
24 counsel for the Futures Representative appointed by the Court in this case.

25 7. Notice of the filing of this Application has been served on the Office of the United
26 States Trustee, the Debtor, counsel to the Committee, counsel to Futures Representative and any
27 party who has requested special notice as of the date of the Notice.

1
2 8. Pursuant to the Interim Fee Procedures Order, the Debtor is authorized to make the
3 payment requested herein without a further hearing or order of this Court unless an objection to this
4 Application is filed with the Court and served within ten (10) calendar days after the date of mailing
5 of the Notice of this Application. If such an objection is filed, the Debtor is authorized to pay the
6 100% of the uncontested expenses.

7 9. The reimbursement of expenses sought in this Application is not final. Upon the
8 conclusion of this case, SMO will seek fees and reimbursement of the expenses incurred for the
9 totality of the services rendered in the case. Any interim fees or reimbursement of expenses approved
10 by this Court and received by SMO will be credited against such final fees and expenses as may be
11 allowed by this Court.

12 10. Based upon the foregoing, SMO respectfully requests that the Debtor pay
13 compensation to SMO as requested herein pursuant to and in accordance with the terms of the
14 Interim Fee Procedures Order.

15 DATED: November 24, 2009

SNYDER MILLER & ORTON LLP

16 By:

17 
18 Peter P. Meringolo
19 Special Insurance Counsel for Debtor and
20 Debtor in Possession, Plant Insulation Company

CERTIFICATE OF SERVICE

I, Michelle Traina, declare that I am over the age of eighteen years and am not a party to this action. My business address is 180 Montgomery Street, Suite 700, San Francisco, California 94104.

On November 24, 2009, I served the following:

**SNYDER MILLER & ORTON LLP'S THIRD COVER SHEET APPLICATION FOR
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM OCTOBER 1, 2009
THROUGH OCTOBER 31, 2009**

on the interested parties in this action as follows:

[X] BY U.S. MAIL: I caused the above-referenced documents to be served on the parties below which are designated with an asterisk (*) by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid.

[X] BY EMAIL: I caused the above-mentioned documents to be served by email on the parties listed on the enclosed service list on the date specified above, except those designated with an asterisk.

*Debtor Plant Insulation Company c/o TRAVIS & PON 2271 California Street San Francisco, CA 94115 Email: david.j.gordon@verizon.net	*United States Trustee c/o Office of the United States Trustee Donna S. Tamanaha Minnie Loo 235 Pine St., Suite 700 San Francisco, CA 94104-3401 Email: Minnie.Loo@usdoj.gov , Donna.S.Tamanaha@usdoj.gov	*Counsel for Debtor c/o JONES DAY Peter J. Benvenutti, Esq. Tobias S. Keller, Esq. Michaeline H. Correa, Esq. 555 California Street, 26th Floor San Francisco, CA 94104 Email: tkeller@jonesday.com , pjbenvenutti@jonesday.com , mcorrea@jonesday.com
Peter J. Benvenutti Tobias S. Keller Michaeline H. Correa JONES DAY 555 California Street, 26th Floor San Francisco, CA 94104 Telephone: (415) 626-3939 Facsimile: (415) 875-5700 Email: jbenvenutti@jonesday.com tkeller@jonesday.com mcorrea@jonesday.com	Debtor's Special Insurance Counsel c/o MORGAN LEWIS & BOCKIUS Jeffery S. Raskin, Esq. One Market, Spear Street Tower San Francisco, CA 94105-1596 Email: jraskin@morganlewis.com	*Counsel to the Hon. Judge Charles B. Renfrew (Ret.), Futures Representative c/o FERGUS, A LAW OFFICE Gary Fergus, Esq. 595 Market St., Suite 2430 San Francisco, CA 94105 Email: gfergus@ferguslegal.com

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Case No. 09-31347

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CERTIFICATE OF SERVICE

Case No. 09-31347

Case 09-31347 Doc# 394 Filed: 11/24/09 Entered: 11/24/09 10:47:34 Page 6 of 9

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Case No. 09-31347

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EMAIL SERVICE LIST

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, that this declaration is executed on **November 24, 2009**, at San Francisco, California.

Michelle Traina

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Case No. 09-31347